

1 Marc Wolstenholme
2 5 Shetland Close
3 Coventry, England CV5 7LS
4 Telephone: 044 7827964404
5 Email: marc@mwwolf-fiction.co.uk
6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S SUPPLEMENTAL
OPPOSITION TO DEFENDANT'S MOTION
FOR COSTS BOND

15
16 Dated this: April 25, 2025

17 M.WOLSTENHOLME.
18 [MARC WOLSTENHOLME]
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TO THE HONORABLE COURT:

Plaintiff Marc Wolstenholme respectfully submits this Supplemental Opposition to Defendant Riot Games, Inc.'s Motion for Plaintiff to Post Costs Bond. Plaintiff requests that the Court deny the motion in its entirety based on the following:

I. INTRODUCTION

Plaintiff is a private citizen, with disabilities and not earning as his work is being violated by Riot Games, proceeding pro se and residing outside the United States. The amount sought by Defendant — \$100,000 — would have the practical effect of denying Plaintiff access to justice. Plaintiff asserts non-frivolous claims of copyright infringement, misuse of trauma writing, and systemic misconduct that deserve a full and fair hearing. The Plaintiff has shown that Riot are directly abusing the Plaintiff and using the court proceedings to do so to prevent them from actually having to face up to stealing from a vulnerable person, then abusing that same victim. These abusive practices are dangerous and criminal and have clearly been shown to be a long pattern of behavior at Riot Games and need to be investigated.

How far is the court willing to let them get away with these behaviors before they are challenged and penalized? How many lives do they need to destroy before they are shut down?

1 **II. ARGUMENT**

2 A. Financial Hardship and Unfair Prejudice

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4 Plaintiff is not a corporation, business entity, or a wealthy individual. Imposing a
5 bond would create an insurmountable financial barrier, effectively terminating Plaintiff's right to
6 pursue serious claims and allowing Riot to keep raping the lives of vulnerable people, and they
7 will.
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9 The Plaintiff respectfully informs the Court that he is unable to post such a bond
10 due to limited financial resources, medical expenses, and reduced earning capacity resulting from
11 documented disabilities and these proceedings which have been abused and dragged out for 3.5
12 years already. It is sick that a company with 22 billion dollars would even steal a man's earning,
13 then lean on the lack of earning to bully him out of gaining justice. The very fact that Riot has
14 pulled this card should result in serious misconduct penalizations. We are here not because the
15 Plaintiff wants to be, but because Riot systematically abuses vulnerable people, and the IP of
16 other creatives then used what is quite possibly Military-civil-fusion black budget money to
17 abuse their many victims in courts, then laugh at the 100 of millions of dollars in fines because
18 of its pocket change for them. This is directly evidence of pulling, in with a bundle of motions
19 obviously designed to harass and overwhelm the Plaintiff within an hour after they misused the
20 Settlement conference to litigate access and to present inadmissible evidence of snapshots from
21 wayback machine which had been manually edited and mis-represented to pretend that they
22 didn't have access. Wow, really? How much are they allowed to get away with.
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1 B. Meritorious Claims and Public Importance

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3 Plaintiff's claims are not frivolous. They involve substantial allegations of
4 misconduct by a major corporation, including exploitation of trauma writing for commercial
5 profit. These claims touch upon issues of intellectual property rights, disability protections, and
6 corporate accountability, all of which are being evidenced more in their abusive tactics and
7 actions which are clearly designed to intentionally inflict emotional harm, evade corporate
8 accountability, oppress a disadvantage competitor, sabotage the plaintiff's case and life, and to
9 claim rights over clearly stolen IP, which has been the same patterns of "Swipe N Gripe" then
10 sabotage and abuse which Riot Games was founded on and this has been well documented in the
11 plaintiff's NOTICE REGARDING DEFENDANT'S LITIGATION CONDUCT AND WIDER
12 PUBLIC SAFETY CONCERNS Dkt 96 and 96-1 and other filings which are needed to address
13 the concerns.
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16 The strong public interest in adjudicating these claims weighs against imposing a
17 prohibitive bond. These cases are the tip of a very dark iceberg which needs to be turned over.
18 Riot poses a serious and continued threat to public safety and security.
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21 C. Bond Would Chill Access to Justice

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23 Forcing a vulnerable, disabled pro se litigant to post \$100,000 would create an
24 undue chilling effect on constitutional rights. Access to courts must not be conditioned on
25 wealth.
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2 Federal courts have broad discretion to waive or reduce bonds where justice so
3 requires, particularly where hardship would effectively bar a legitimate case from proceeding.
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6 D. Request for Waiver
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8 In light of the above, Plaintiff respectfully requests that the Court:
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10 Deny Riot's Motion for Costs Bond in full;
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12 Alternatively, set a nominal bond (e.g., \$100 or less) to preserve Plaintiff's access
13 to the courts.
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16 **III. CONCLUSION**
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18 Riot are diverting the attention away from justice and discovery and are clearly
19 abusing the Plaintiff, Is this what Justice is about? The one who pays wins and others are left
20 abused and cheated.

21 For the foregoing reasons, Plaintiff respectfully requests that the Court deny
22 Riot's Motion to Post Costs Bond, or in the alternative, impose only a nominal bond.
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24 Plaintiff additionally, respectfully requests that the Court intervene to stop Riot
25 from abusing the Plaintiff and to consider if Criminal proceedings should be triggered.
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**DECLARATION OF MARC WOLSTENHOLME IN SUPPORT OF
OPPOSITION**

I, Marc Wolstenholme, declare under penalty of perjury:

I am the Plaintiff in the above-entitled action.

I am currently unable to post a \$100,000 bond due to my limited financial resources.

I have no income as I am a writer unable to write because of these proceedings and Riot's abuse, no substantial assets, and ongoing medical expenses related to my documented disabilities.

Imposing a \$100,000 bond would effectively bar me from pursuing my claims and deny me access to the courts.

I respectfully request that the Court deny Riot Games, Inc.'s Motion for Costs Bond or reduce it to a nominal amount which I will have to pay in parts.

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made
are true and accurate

Executed on April 25, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

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Coventry, England CV5 7LS

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